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October 10, 2014

Secretary

Ms. Marlene H. Dortch

445 12th Street, S.W.

Washington, D.C. 20554

Federal Communications Commission

Accepted/Files

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Federal Communications Commission Office of the Secretary

Re: Request for Experimental Authorization for Licensed Broadcast Station

Dear Ms. Dortch:

On behalf of KVMD Licensee Co., LLC ("KVMD"), the licensee of Full-Service Digital Television Station KVMD(TV), Twentynine Palms, California (the "Station"), and pursuant to Section 5.203, *et seq.*, of the Commission's Rules, it is hereby requested that the Commission issue an experimental authorization to the licensee for the purpose of conducting technical experimentation seeking to improve the technical phases of operation and service of the digital television broadcast service.

The experimental work that KVMD wishes to undertake involves H.264, MPEG-4 AVC, or AVC. It is a video compression format that is used for the recording, compression and distribution of video content. It is considered by the video engineering community to be one of the most commonly used formats for the production and delivery of video content.

KVMD believes that H.264 creates a better picture for viewers. Most devices that receive video over the Internet, which is becoming more common with newer and "smart" reception devices, have the capability to decode H.264. Likewise, it is understood that most motion pictures that are delivered over the Internet by such content delivery services as Netflix and YouTube make use of H.264.

KVMD proposes that, for a period of three to four weeks, it will transmit its broadcast signal using H.264. During that period, the Station will attempt to learn how many of its viewers have a reaction, either positive or negative, to the H.264 format. At the same time, KVMD will contact reception device manufacturers in an effort to have them evaluate how their equipment, which can decode the H.264 format, operates in a "real world" experiment of a broadcast station transmitting in the H.264 format.

In sum, H.264 is a format that has increasingly popularity for Internet content delivery services. The question is whether it also has relevance to traditional digital broadcasting services. By this

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short, experimental operation, KVMD will attempt to determine if H.264 can also work in the broadcast environment and how it measures up in an operational setting. During the performance of the experimental work, KVMD will comply with the provisions of Section 5.203(c) of the Commission's Rules

In order to obtain the necessary knowledge of H.264 service to the public, KVMD urges the Commission to provide it with the necessary authorization to under the requested experimental service.

Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

Barry A. Friedman

cc: Mr. Kevin Harding (Video Division)